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October 16, 1987

RECEIVED
OCT 19 10 27 AM '87
BUREAU OF
INDUSTRIAL SITE
EVALUATION

HAND DELIVERED

Mr. Frank D'Ascensio
Passaic Valley Sewer Commission
600 Wilson Avenue
Newark, New Jersey 07105

Re: Fine Organics Corp.
Lodi, New Jersey

Dear Mr. D'Ascensio:

Enclosed please find a letter from Environ Corporation and a document entitled Summary Report of Preliminary Environmental Sampling of the Fine Organics Facility, Lodi, New Jersey, ECRA Case No. 86009. By copy of this letter, we are also submitting a copy to Mr. Michael Nalbhone of the Industrial Site Evaluation Element, New Jersey Department of Environmental Protection. We intend to proceed with the implementation of the remedial measures described in the report as expeditiously as possible. It is important, in the context of the overall site investigation and ultimate remediation of the facility, that the balance of the on-site ECRA investigation commence as soon as possible. We hope that the review of the Sampling Plan will be expedited by the Industrial Site Evaluation Element and that approval will be forthcoming within the very near future.

If you have any questions or need additional information, please do not hesitate to call me.

Very truly yours,

Edward A. Hogan /dtm

Edward A. Hogan

EAH:dtm

(Dictated but not read)

Enclosures

cc: Mr. Michael Nalbhone (with enclosures)

SDMS Document



88605

October 14, 1987

Mr. Frank D'Ascensio
Passaic Valley Sewer Commission
600 Wilson Avenue
Newark, NJ 07105

Re: Fine Organics Corporation, Lodi, New Jersey

Dear Mr. D'Ascensio:

On September 30, 1987, representatives of Fine Organics Corporation (FOC), HEXCEL Corporation, its counsel and consultants (ENVIRON), and the state of New Jersey DEP met with you and your staff to discuss an ongoing investigation of the FOC facility in Lodi, New Jersey under the ECRA program. At this meeting, ENVIRON presented a detailed chronology of the prior environmental sampling and chemical testing that has been conducted at the facility. Our presentation and subsequent discussions specifically focused on the information related to the potential for release of chemical contaminants into the industrial sewer system at the facility, which is part of the Passaic Valley Sewer Commission system. This presentation, and a similar presentation to the NJDEP, has been documented by ENVIRON in a summary report which is attached.

Investigations conducted at the FOC facility to date have included 1) inspection and dye testing of internal plumbing, sewer, and storm drainage systems, 2) collection and chemical analysis of shallow soil samples in and around chemical process areas, 3) collection of water, sediment, and oil samples from the onsite industrial sewer system for chemical analysis, and 4) collection of sediment samples from the industrial sewer offsite (downstream) from the FOC facility to and including the Hendrix pump station. A complete discussion of the findings of these investigations are included in the attached summary report. With specific regard to the industrial sewer system, significant findings of the investigations to date are as follows:

- o The industrial sewer system on and downstream from the facility property is substantially clogged with sediments and sludge.
- o Chemical testing of sediments from the sewer system indicates that total petroleum hydrocarbons (TPHCs) and PCBs are present in the sediment samples. Concentrations of PCBs range from 10 mg/kg to 7660 mg/kg. In general,

the concentration of PCBs in sewer sediments increases downstream on the sewer system, with the highest concentration reported in the wetwell at the Hendrix pump station.

- o Oil has been observed floating in two structures (a manhole and a catch basin) on the industrial sewer on the FOC property. Chemical test of this oil has indicated PCBs at concentrations ranging from 240 to 936 mg/kg.
- o The oil observed in the sewer system on the FOC property is currently trapped in these two structures as a direct result of surcharging conditions, i.e., the inlet and outlet pipes of both structures are below the normal water level in the sewer.
- o During several inspections of the wetwell at the Hendrix pump station, floating oil has not been observed. This suggests that the oil observed in the sewer system on the FOC property is currently being trapped in the structures and not released downstream.
- o In early 1986, a treatment system was installed by FOC to remove oil and any aqueous phase PCBs from water that accumulates in a pit in the process building (building no. 1) at the facility. After treatment, this water has been discharged into the industrial sewer system.
- o Upon discovery of oil in the sewer system in December, 1986, and test results obtained in January, 1987, an aggressive program was undertaken to remove oil and to reduce the potential for any offsite release. This program initially included frequent inspection and bailing of oil from the manhole and catch basin on the sewer system, which effectively acted as oil traps. Later, after the flow of oil began to diminish, petroleum absorbent spill pillows were installed in the sewer system to collect any layer of oil that may accumulate. The sewer system has been inspected on a weekly basis and additional spill pillows installed or changed as needed. As an interim measure until the source of the oil can be identified and removed, this program of collecting oil in the sewer has been effective in reducing the potential for offsite releases.
- o PCB materials are not currently used in any manner at the FOC facility and PCB contamination from the ongoing operation is not an issue.

During our discussions at our meeting on September 30, 1987, we also described future plans for additional investigations and remediation of PCB contaminated oils at the FOC facility. Oil has been detected in the saturated zone beneath the boiler room at the FOC facility. While the direct connection between the soil beneath the boiler room and the industrial sewer system is not apparent, this oil, to the best of our present knowledge, is the only potential onsite source identified to date that might cause the oil accumulation in the onsite sewer system. A system of underdrains, to lower the water table and collect oil in this area, is currently under design. It is anticipated that the design of this system will be completed within the next few weeks.

Water that is collected from the underdrain system and ground water seepage into the pit in building no. 1, will be treated to remove any oil and aqueous phase PCBs. The current treatment system is comprised of a dual-stage, diatomaceous earth and granulated activated carbon filter. A reevaluation of the treatment system is being conducted as part of the ongoing design.

In accordance with our discussions on September 30, 1987, the treated seepage from this pit, or any subsequent ground water collected from beneath the boiler room, will be discharged into the sewer system only after testing and a finding of no PCBs above laboratory detection limits. Beginning September 30, 1987, all effluent from this treatment system has been stored onsite in a tank. The effluent in the tank will be tested by a NJDEP certified chemical laboratory for PCBs before it is discharged. Discharge of this effluent into the sewer will be through the permitted PVSC outfall.

This treatment and discharge system will be conducted in a "batch mode" and will occur only as frequently as is necessary to empty the effluent storage tank. Records of discharges will be maintained at the facility and will be provided to you at your request. The frequency of this discharge may vary depending upon rainfall and ground water seepage conditions. All chemical analyses of water discharged from the effluent storage tank will be retained by FOC at the facility and will be made available to PVSC or NJDEP at their request.

It is our understanding that the continued operation of this treatment system may require an amendment to the current sewer discharge permit for the FOC facility. We will continue to work with you and your staff in order to clarify any permit requirements.

The investigations of the source of oil at the facility, which is observed to be accumulating in the sewer system, will continue. HEXCEL Corporation is currently negotiating with a PCB response

contractor to begin remedial work at the facility. It is expected that these negotiations will be completed by the end of October, 1987. Further investigations and remedial work will then be undertaken to identify the source of this oil and eliminate the release into the onsite sewer system. These investigations will initially involve 1) isolation and pumping of water and sediments from the sewer manhole and catch basin, in which oil has been observed to be accumulating, 2) inspection of these structures for any inflow pipes which may be a source of this oil, and 3) potentially additional dye testing or remote tracing of undocumented pipe systems to determine their origin. In addition, borings will be constructed in the vicinity of the sewer system in the rear property to determine if the ground water in this area may be a source of the oil through sewer infiltration.

If a source of the oil in the sewer is identified, immediate steps will be taken to terminate the release. These might include installation of temporary plugs in any pipe which is shown to be transporting oil to the sewer system or installation and operation of a recovery system to remove oil from ground water, if appropriate. As previously described, a ground water and oil recovery system will be installed in the vicinity of the boiler room, although it is unclear, based on current information, whether this will totally eliminate the accumulation of oil in the sewer. It is expected that these additional remedial measures will be completed as expeditiously as possible. Based on current estimates we expect that these measures will be in place by December, 1987.

In the interim period, the inspection of the sewer and installation of petroleum absorbent spill pillows will continue. In order to ensure that this program effectively reduces the potential for offsite release, the inspection period will be increased from the prior weekly interval to daily inspections. A log of the inspections will be maintained at the facility. Any changed conditions in the sewer system (e.g., the rate of oil accumulation) will be immediately reported to the facility operations manager and appropriate additional steps such as manual bailing of oil, installation of additional petroleum absorbent materials and downstream testing will be undertaken.

During our meeting on September 30, 1987, you requested that aqueous samples be obtained from the sewer system to demonstrate that no aqueous phase PCBs are currently being released. On October 6, 1987, ENVIRON collected a water sample for analysis of PCBs from manhole M1, which is the manhole farthest downstream on the FOC property on the industrial sewer system. In addition, a sample was collected from the industrial sewer outfall at the Hendrix pump station for PCB analysis. These samples were submitted to Century Environmental Laboratories for analysis. On October 12, 1987 the

October 14, 1987

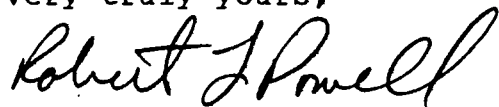
laboratory verbally reported to ENVIRON that both samples were "not detected" for PCBs. A written report of these analyses should be available within approximately one week.

In the future, in order to more closely monitor the potential for release of any PCBs into the sewer, aqueous samples will be collected from manhole M1 and the Hendrix pump station on a monthly basis. These samples will be analyzed for PCBs. All laboratory reports of these analyses will be retained at the FOC facility and provided to you at your request. These results will be routinely reported to you in a brief letter. This program of monthly testing of the sewer system will continue until the source of oil accumulating in the sewer at the FOC facility has been identified and eliminated.

I hope this information responds to your concerns and information needs as expressed during our meeting on September 30, 1987. HEXCEL and FOC are committed to expediting the investigation and resolution of the accumulation of these materials into the sewer system. This work is proceeding in advance of the balance of the ECRA investigation at the facility, which should begin within the next few months. We felt, however, that the need to control and eliminate the accumulation of these materials in the sewer system was of sufficient concern and urgency that this work should proceed while the balance of the ECRA investigation is under review by the NJDEP.

We look forward to continuing to work with you and your staff toward the successful resolution of these issues. We will continue to keep you informed of our progress with regard to work on the industrial sewer system.

Very truly yours,



Robert L. Powell, Ph.D., P.E.
Project Manager

RLP:slh
1856H

Enclosure

cc: Michael Nalbhone, NJDEP

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